

January 6, 2021



Ref: 57346.11

Mr. Kevin Burke
Vermont Department of Environmental Conservation
Watershed Management Division, Stormwater Section
1 National Life Drive, Main 2
Montpelier, VT 05620-3522

Re: Green Mountain Power Corporation
Kingdom Community Wind Project
Stormwater Discharge Permit # 6216-INDS Renewal/ Amendment Application

Dear Kevin:

On behalf of Green Mountain Power Corporation, ("GMP" or "Applicant"), VHB has prepared this revised renewal/amendment application to the Department of Environmental Conservation ("DEC") for Individual Stormwater Permit 6216-INDS, which regulates the stormwater treatment practices at the Kingdom Community Wind facility ("KCW" or "Project") in Lowell, Vermont. A timely renewal application for this permit was originally submitted on May 19, 2016, the prior permit was administratively continued by DEC, and the renewal application has not been acted upon by DEC at this time. This request provides additional information that documents compliance with the prior permit conditions and amends the project plans to reflect minor changes to stormwater treatment practices that were implemented in 2020.

Since its completion, GMP has operated KCW in accordance with the conditions of 6216-INDS and has performed all maintenance and reporting activities required by the permit. Pursuant to the recent Public Utility Commission Section 248 review and subsequent authorization dated August 3, 2020, four of the existing level spreaders (LS-A8, LS-A9, LS-A24, and LS-C16) were modified or slightly relocated in 2020. Portions of these level spreaders and/or their associated vegetated disconnect areas were previously located fully or partially on lands protected as mitigation parcels under the Memorandum of Understanding ("MOU") between GMP, the landowner, and the Vermont Agency of Natural Resources ("ANR"). In order to ensure future operational continuity of the KCW stormwater system, GMP has relocated these level spreaders to eliminate potential conflicts between the operational stormwater management system and lands set aside in support of mitigation goals. The alterations of these treatment practices were designed and constructed to maintain the equivalent method of treatment and manner of discharge authorized by the prior permit. The supporting materials that accompany this application provide documentation that the relocated level spreaders meet the same requirements as the practices they replace. The application

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materials that were submitted in support of the original INDS application in 2011 have been updated to reflect these alterations and clearly identify the practices that were modified.

In addition to the renewal of the INDS, GMP respectfully requests that the original permit be amended to remove Condition 14 of 6216-INDS that required a study of the level spreader performance in order to document compliance with Section 2.5.2 of the Vermont Stormwater Management Manual (2002), for New Design Alternative Systems. The Level Spreader Monitoring Study was successfully completed in 2018 and results were summarized in a report to DEC prepared by VHB and dated February 25, 2019. The report demonstrated that the observed performance of the alternative stormwater treatment practices at the site met the required treatment standards.

The following items are being submitted for review in support of the INDS renewal/amendment:

- Complete INDS Notice of Intent form
- Attachment 1: Narrative
 - Narrative
 - Subwatershed Map (updated to include level spreader modifications)
 - Soils Map (last revised September 10, 2010)
 - Discharge Point Summary Table (changes denoted by **bold** text)
- Attachment 2: Modeling
 - Schedule A forms (locations with changes only)
 - CPv Analysis Summary (changes denoted by **bold** text)
 - Downstream Analysis Summary (changes denoted by **bold** text)
 - Level Spreader Summary (changes denoted by **bold** text)
 - HydroCAD model output (full set that includes the relocated level spreaders)
- Attachment 3: Plans
 - Original Project Plans (last revised 2011, with annotations by VHB April 20, 2020)
 - Level Spreader Relocation Plans (last revised May 29, 2020)
- Attachment 4: Level Spreader Monitoring Study (February 25, 2019)
 - Final report associated with the alternative stormwater treatment practice monitoring requirements. This study was completed in accordance with the prior permit.

As we have previously discussed, we are not including the Standards Compliance Workbook or Worksheets that would be required for an application under the 2017 VSMM. Similarly and as denoted above, we are including only the materials that were modified as a result of the relocated level spreaders rather than copies of all materials that were previously submitted in support of the original application.

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This letter and the renewal application form are being submitted electronically. A check in the amount of \$240 for the administrative processing fee was submitted with the May 19, 2016 renewal application that has not been acted upon. Please let us know if another administrative processing fee is required at this time. Thank you for your consideration of this application. We are happy to review and discuss the enclosed materials if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Robert W. Wildey".

Robert Wildey, PE, CPESC
Water Resources Engineer

RAW/jmd
Enclosures

cc: Preston Gregory, Green Mountain Power
Jason Lisai, Green Mountain Power
Geoff Hand, Dunkiel Saunders
Moose Mountain Wind, LLC
Peter and Deborah Mygatt
Wind Blown Energy, LLC
Corrow, c/o Gary Dubuque